

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE:	)	CHAPTER 7
	)	
ANGELA M. MORGAN	)	CASE NO. 20-65889-PMB
	)	
	)	
DEBTOR.	)	
	)	

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**MOTION FOR ADDITIONAL TIME  
TO COMPLETE INVESTIGATION**

NOW COMES Nancy J. Gargula, United States Trustee for Region 21 (“United States Trustee”) and moves the Court to keep this case open through and including December 31, 2020 for the limited purpose of allowing the United States Trustee an opportunity to complete her investigation and, if appropriate, seek relief against one or more persons who allegedly provided bankruptcy assistance to the debtor. As cause therefore, the United States Trustee shows as follows:

1. This case commenced on April 27, 2020 when a petition for relief under chapter 7 of the United States Bankruptcy Code naming Angela M. Morgan as debtor (“Petition”) (Docket No. 1) was submitted to the Clerk of Court.
2. S. Gregory Hays was appointed chapter 7 trustee (“Chapter 7 Trustee”).
3. On June 8, 2020, attorney Howard J. Kent filed a Notice of Appearance as counsel for Angela M. Morgan (“Debtor”). (Docket No. 16).
4. A section 341 first meeting of creditors was held and concluded on June 23, 2020.
5. Debtor received a discharge on August 11, 2020. (Docket No. 24).
6. The Chapter 7 Trustee filed a notice of abandonment of property on September 28, 2020. (Docket No. 29).
7. The United States Trustee is reviewing this case under Bankruptcy Code sections 110,

526, 527, and 528, based on information provided by the debtor.

8. The United States Trustee's attorney is considering action to seek relief against one or more persons who allegedly provided debtor bankruptcy assistance with, or in connection with, this case prior to her attorney's appearance in the case.

9. The United States Trustee needs additional time to complete her investigation of debtor's allegations and review allegations with the debtor, through counsel, to ensure they are correct. At the same time, the United States Trustee would like the Chapter 7 Trustee to be able to file documents he may deem appropriate, such as a report of no distribution, without affecting her investigation.

WHEREFORE the United States Trustee respectfully requests the case remain open for the limited purpose set forth herein through and including December 31, 2020, and such further time as may be needed to resolve any motion or complaint filed by the United States Trustee.

Date: November 12, 2020.

NANCY J. GARGULA  
UNITED STATES TRUSTEE, REGION 21

/s/ Shawna Staton  
Shawna Staton  
Georgia Bar No. 640220  
United States Department of Justice  
Office of the United States Trustee  
Suite 362, Richard B. Russell Building  
75 Ted Turner Drive, S.W.  
Atlanta, Georgia 30303  
Phone: 404-331-4437, Ext. 152  
Email: [Shawna.P.Staton@usdoj.gov](mailto:Shawna.P.Staton@usdoj.gov)

### **CERTIFICATE OF SERVICE**

I hereby certify that I am over the age of 18 and that on November 12, 2020, the foregoing *United States Trustee's Motion for Additional Time to Complete Investigation* will be electronically filed using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to parties who have

appeared in this case under the Bankruptcy Court's Electronic Case Filing program to ensure delivery to:

S. Gregory Hays

ghays@haysconsulting.net, saskue@haysconsulting.net;GA32@ecfcbis.com

Brian K. Jordan on behalf of Creditor PHH Mortgage Corporation

ecfganb@aldridgepite.com, bjordan@ecf.inforuptcy.com

Brian K. Jordan on behalf of Creditor U.S. Bank National Association

ecfganb@aldridgepite.com, bjordan@ecf.inforuptcy.com

Howard Jay Kent on behalf of Debtor Angela M. Morgan,

hkent@thekentlawfirm.com,

rkent@thekentlawfirm.com;kee@dcttyping.com;thekentlawfirm@gmail.com

Bryce R. Noel on behalf of Creditor U.S. Bank National Association

ecfganb@aldridgepite.com, bnoel@ecf.inforuptcy.com

I further certify that on November 12, 2020, I will cause a copy of foregoing *United States Trustee's Motion for Additional Time to Complete Investigation* to be served via United States First Class Mail, with adequate postage prepaid on the following parties at the address shown for each.

Angela M. Morgan

51 Church Road

Stockbridge, GA 30281

DATED: November 12, 2020

/s/ Shawna Staton

Shawna Staton

Georgia Bar No. 640220